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September 20, 2022

Via Email

Lauren A. McCray
DAVIS WRIGHT TREMAINE LLP
920 Fifth Ave., Ste. 3300
Seattle, WA 98104

RE: CLIFTON JETT TRANSPORT, INC. V. BARRETTE OUTDOOR LIVING, INC.
Cause No. 1:21-cv-01064-JPH-DLP
CJT's AMAZON-related revenue documents

Dear Lauren:

As you know, BARRETTE OUTDOOR LIVING, INC. is seeking various documents from CLIFTON JETT TRANSPORT LLC in the above lawsuit, relating to the latter's relationship with AMAZON. The Court has also ordered CJT to produce any outstanding:

- 1) Documents showing CJT's revenues, expenses, and profits in 2019, 2020, 2021, and early 2022;
- 2) Documents and other records relating to lost revenue or other damages suffered by CJT; and
- 3) Documents relating to CJT's subsequent work for Amazon.

(Discovery Conf. Order at 3) [Dkt. 64].

Although we have been working with CJT to provide these documents, BARRETTE remains unsatisfied, seeking contempt sanctions – arguing that “CJT intentionally has chosen not to comply with the Court’s Order to produce documents to avoid a reduction of its claim for hundreds of thousands of dollars.” (Br. in Supp. of Mot. for Contempt at 12) [Dkt. 74].

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Per my July 15 letter to AMAZON, “[w]e intend to comply with the Court’s orders,” and would appreciate your help in identifying any documents in CJT’s possession, custody, or control that would establish its revenues from AMAZON. CJT has previously worked with its AMAZON business manager to obtain such documents, with only limited success. Any aid in locating revenue statements (such as invoices), or tax documents (such as Forms 1099) would be a boon.

Respectfully,

A handwritten signature in black ink, appearing to read "BCE", with a long horizontal flourish extending to the right.

Benjamin C. Ellis